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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

In Re: HALL LABS, LLC 3500 Mountain Vista Parkway Provo, UT 84606	Bankruptcy No.25-21038 Chapter 11  FILED ELECTRONICALLY
Debtor in Possession.	Judge Joel T. Marker

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**DEBTOR’S RESPONSE TO STAG INDUSTRIAL HOLDINGS, LLC’S MOTION FOR  
COMFORT ORDER REGARDING SCOPE OF AUTOMATIC STAY**

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Hall Labs, LLC., the debtor and debtor in possession (the “Debtor”) in the above-captioned Chapter 11 case, files this response to *STAG INDUSTRIAL HOLDINGS, LLC’S MOTION FOR COMFORT ORDER REGARDING SCOPE OF AUTOMATIC STAY* (the “Motion”) as follows:

1. The Debtor does not have any objection *per se* to the Court granting the Motion, specifically since in paragraph 18 of the Motion, it appears that STAG is seeking “only a determination from the [Federal] Court on the issue of liability”.
2. The Debtor, however, would object to STAG taking any action to collect any judgment that is issued against assets of the Debtor and/or its affiliates without STAG coming back before this Court to obtain further relief from the automatic stay.

**CONCLUSION**

Although the Debtor does not object to the relief requested in the Motion, the Debtor respectfully requests that the Court conditionally grant the relief to 1) allow STAG to have the Federal Court to determine the issue of liability; and, 2) that any such comfort order also specifically indicate before STAG takes any action to collect any judgment against assets of the Debtor and/or any of its affiliates it must come back before this Court to obtain further relief from the automatic stay. The Debtor also requests such other and further relief as the Court deems just and proper.

DATED this 13<sup>th</sup> day of April 2025.

**DIAZ & LARSEN**

By: /s/ Andres Diaz  
Attorneys for the Debtor in Possession

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13<sup>th</sup> day of April 2025, I caused a true and correct copy of the foregoing **DEBTOR'S RESPONSE TO STAG INDUSTRIAL HOLDINGS, LLC'S MOTION FOR COMFORT ORDER REGARDING SCOPE OF AUTOMATIC STAY** to be filed with the Clerk of the Court using the CM/ECF system, which sent notice of electronic filing to all electronic filing users, including but not limited to the following:

Engels J. Tejeda  
Tyler S. Erickson

Matthew Burne (US Trustee Program)

/s/ Andres Diaz